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UBER TECHNOLOGIES, INC.  
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,  
19 Plaintiff,  
20 v.  
21 UBER TECHNOLOGIES, INC.,  
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,  
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS UBER  
TECHNOLOGIES, INC. AND  
OTTOMOTTO LLC'S  
ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL PORTIONS OF  
THEIR MOTION TO STRIKE  
VAGUE AND OVERBROAD TRADE  
SECRET CLAIMS AND  
EMERGENCY MOTION FOR  
EXPEDITED BRIEFING AND  
HEARING AND EXHIBITS  
THERE TO**

Pursuant to Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (“Defendants”) submit this motion for an order to file under seal portions of their Motion to Strike Vague and Overbroad Trade Secret Claims and Emergency Motion for Expedited Briefing and Hearing and Exhibits Thereto. Specifically, Defendants request an order granting leave to file under seal the confidential portions of the following documents:

Document	Portions to Be Filed Under Seal	Designating Party
Motion to Strike Vague and Overbroad Trade Secret Claims and Emergency Motion for Expedited Briefing and Hearing (“Motion”)	Highlighted Portions	Plaintiff (green)
Declaration of Esther Chang	Highlighted Portions	Plaintiff (green)
Exhibits 2-7 and 14-16 to the Declaration of Esther Chang	Entire Documents	Plaintiff
Exhibits 12-13 to the Declaration of Esther Chang	Highlighted Portions	Plaintiff (green)
Exhibit 1 to the Declaration of Rudy Kim	Entire Document	Plaintiff

The green-highlighted portions of the Motion, the green-highlighted portions of the Declaration of Esther Chang, and the green-highlighted portions of Exhibits 12-13 to the Chang Declaration, as well as the entireties of Exhibits 2-7 and 14-16 to the Chang Declaration and the entirety of Exhibit 1 to the Declaration of Rudy Kim, contain information that has been designated “Highly Confidential – Attorneys’ Eyes Only” by Waymo in accordance with the Patent Local Rule 2-2 Interim Model Protective Order (“Protective Order”), which the parties have agreed governs this case (Transcript of 3/16/2017 Hearing, page 6). Defendants file this material under seal in accordance with Paragraph 14.4 of the Protective Order. (Declaration of

1 Michelle Yang in Support of Defendants' Administrative Motion to File Documents Under Seal  
2 ("Yang Decl.") ¶ 3.)

3 Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the  
4 documents at issue, with accompanying chamber copies.

5 Defendants served Waymo with this Administrative Motion to File Documents Under  
6 Seal on August 7, 2017.

7 For the foregoing reasons, Defendants request that the Court enter the accompanying  
8 Proposed Order granting Defendants' Administrative Motion to File Documents Under Seal and  
9 designate the service copies of these documents as "HIGHLY CONFIDENTIAL –  
10 ATTORNEYS' EYES ONLY."

11  
12 Dated: August 7, 2017

MORRISON & FOERSTER LLP

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14 By: /s/Arturo J. González  
ARTURO J. GONZÁLEZ

15 Attorneys for Defendants  
16 UBER TECHNOLOGIES, INC.,  
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18 TRUCKING LLC  
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